



**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**



**STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378**

Captain Marc Delao
Regional Engineer
Navy Region Hawaii
850 Ticonderoga St. STE 110
Joint Base Pearl Harbor Hickam, Hawaii 96860

Re: Tank Upgrades Alternatives (“TUA”) and Release Detection Decision Document and Implementation, Sections 3.5 and 4.8 of the Red Hill Administrative Order on Consent (“AOC”) Statement of Work (“SOW”)

Dear Captain Delao:

The U.S. Environmental Protection Agency (“EPA”) and Hawaii Department of Health (“DOH”), collectively the “Regulatory Agencies”, are committed to seeing that the U.S. Department of the Navy and the Defense Logistics Agency continue to make infrastructure improvements at the Red Hill Bulk Fuel Storage Facility. Following the productive discussions held on March 11 and 14, 2019, the Regulatory Agencies expect that the Navy and DLA will submit a combined TUA and Release Detection Decision Document to the Regulatory Agencies in the August to September timeframe of this year.

The Regulatory Agencies have approved the Navy and DLA’s previous work under the TUA (Section 3) and Release Detection (Section 4) portions of the Red Hill AOC SOW. In particular, the TUA Report was approved on May 21, 2018 and the New Release Detection Alternatives Report was approved on August 30, 2018. Following these approvals, the AOC Parties have held important conversations to discuss infrastructure concerns, such as corrosion assessment, tank inspection and repair, and the anticipated tank upgrade proposal. The Regulatory Agencies understand that Navy and DLA may need some additional time during this current phase of Decision Meetings to complete an internal review of the intended tank upgrade proposal, however the Regulatory Agencies do not believe that further technical discussions between the AOC Parties are needed.

As outlined in the Regulatory Agencies’ letter dated March 7, 2018 to Admiral Brian P. Fort, the Best Available Practicable Technology (“BAPT”) identified by the Navy and DLA for the tanks at the Red Hill Bulk Fuel Storage Facility must demonstrate to EPA and DOH’s satisfaction that groundwater and drinking water resources will be protected. Presently, the Navy and DLA are evaluating six general alternatives as candidates for BAPT. These candidates include three single wall options, three double

wall retrofits, along with several improvements to facility's operational practices and contingency measures. The Regulatory Agencies understand that the cost, uncertainty, and level of effort required to implement these options vary dramatically and the TUA and Release Decision Document must include justification supporting the Navy and DLA's tank upgrade proposal.

In the TUA and Release Decision Document, the Navy and DLA should compare the relative environmental performance of each TUA. This comparison should include not only the physical design of the tank vessel, but also other aspects of the various fuel management systems. For example, the identification of BAPT should describe aspects of the tank system, including, but not limited to:

- physical description of the tank vessel,
- release detection,
- leak response procedures, including contingency measures,
- Red Hill tank maintenance procedures, including the integrity of nondestructive examination,
- pipeline integrity; and
- performance of the lower tunnel to contain fuel.

The Navy and DLA's and Release Detection TUA Decision Document and their identification of BAPT should consider these aspects of the tank system and a conservative conceptual site model to adequately compare the environmental performance of different TUAs.

The Red Hill AOC SOW requires the AOC Parties to host public meetings at least annually to provide progress updates to the public. The last public meeting was held in March 14, 2018. The Navy and DLA should be able to communicate clearly their tank upgrade and release detection proposal to the public during an annual meeting to be scheduled for later this year. We look forward to this meeting and would like to utilize that venue to demonstrate a collective commitment to improve the facility's infrastructure and further prevent the likelihood of releases. Please let us know if you have any comments or concerns with this letter.

Sincerely,

Omer Shalev
Project Coordinator
EPA Region 9 Land Division

Roxanne Kwan
Interim Project Coordinator
DOH Solid and Hazardous Waste Branch

cc: Mr. Mark Manfredi, Navy (via email)